N-10111-01
February 12, 2016

Kim Tisa; Regional PCB Coordinator
EPA New England Headquarters
5 Post Office Square – Suite 100
Boston, MA 02109-3912

Re: **PCB Cleanup Plan Addendum No. 2**
Former Polymerine Facility
241 Duchaine Boulevard
New Bedford, Massachusetts
RTN 4-1347

Dear Ms. Tisa:

On behalf of the City of New Bedford, Tighe & Bond has prepared this PCB Cleanup Plan Addendum No. 2 for the property referenced above.

As you are aware, a PCB Cleanup Plan was submitted to EPA in August 2015, and PCB Cleanup Plan Addendum No. 1 was submitted to EPA in December 2015. This Addendum No. 2 submittal addresses comments and questions received to date from EPA regarding the cleanup plan submittals.

Proposed Management of PCB-Impacted Materials: Per your request, we have prepared a data table that summarizes the proposed management of the PCB-impacted building materials and environmental media. Table 1 is attached. This summary table is based on the contents of our PCB Cleanup Plan and PCB Cleanup Plan Addendum No. 1 submittals. However, it should be noted that the "Water in Pits" should not have been classified as "Excluded PCB Waste" in the PCB Cleanup Plan submittal (in Section 6.1.4 of that submittal), but rather it should have been classified as a "PCB Remediation Waste" as clarified in the attached Table 1. Other clarifications and minor additions/modifications are also noted in Table 1.

Also per your request, we have prepared a Proposed Waste Management of PCB-Impacted Building Materials Plan (Figure 1 attached) for further reference. This plan is based on the contents of our PCB Cleanup Plan submittal.

Also, for the non-porous surfaces (metal equipment) that are scheduled to be decontaminated, we are attaching photographs of those items as requested (see attached). As indicated in Table 1, we have modified the approach for the heat exchanger unit.

Other Questions: A summary of the other questions received with our responses are provided below.

For the deed notice, low occupancy area would apply only to the areas located outside the capped area that have PCB concentrations <25 ppm. You would have to discuss under the cap differently.

> The soils beneath the pavement will be managed in place as proposed. Since concentrations beneath the cap exceed low occupancy standards as established by TSCA, our proposed cleanup plan for soils beneath the pavement would be approved under a risk-based approval. The TSCA deed notice and MCP Activity and Use

Limitation (AUL) will address future disturbance of soil beneath the cap, including all required health & safety measures and soil management/regulatory requirements.

Has the City submitted the necessary paperwork and/or obtained the necessary permits required for the work per Section 6.12.1 of the PCB Cleanup Plan submittal:

A Notice of Intent (NOI) per the Wetlands Protection Act and New Bedford Conservation Commission submitted to the New Bedford Conservation Commission, and a NOI hearing is scheduled for February 16, 2016. A copy of the NOI was also forwarded to Natural Heritage and Endangered Species Program for review under the Massachusetts Endangered Species Act.

We hope this addresses your comments and questions. If you have any additional questions, please contact me at 413-572-3222 at your convenience.

Very truly yours,

TIGHE & BOND, INC.

Todd D. Kirton, LSP
Senior Hydrogeologist

Enclosures: Table 1
Figure 1
Photo Reference

Copy: Michele Paul; Director of Environmental Stewardship, City of New Bedford
Ray Holberger; Environmental Planner, City of New Bedford
MassDEP Southeast Region Office
Marc J. Richards, P.E., LSP – Tighe & Bond

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TABLE 1 - PCB Cleanup Plan Addendum No. 2 Submittal*

Summary of Proposed Waste Management of PCB-Impacted Materials

Former Polymerine, Inc.

241 Duchaine Boulevard

New Bedford, Massachusetts

Material Type	Description	Quantity (Approximate)	PCB Concentration	TSCA Classification	Proposed Material Management	Verification Sampling
PCB Bulk Product Wastes						
Caulking material (both ACM and non-ACM[(1)])	Approximately 50 feet of expansion joint caulking materials identified between the metal window frame and the brick on north (and south) entranceways to the former office area - earlier caulking sample PCB-04 detected PCBs at 149 ppm. Other miscellaneous caulking areas that total less than 300 linear feet were also identified in the building during the pre-demolition building audit, including caulking material represented by earlier sample PCB-01 (PCBs at 5.45 ppm). Due to the variability of these caulking areas and to avoid additional caulking characterization, all miscellaneous caulking will be abated as a PCB Bulk Product Waste.	350 feet	5.45 ppm to 149 ppm	PCB Bulk Product Waste - to be disposed at a state permitted landfill that meets requirements of 761.62(b)	All caulking will be removed from the building prior to demolition and disposed as a PCB Bulk Product Waste. In addition, 12 inches of the abutting brick and/or CMU wall (where applicable) will also be segregated for disposal as a PCB Bulk Product Waste. As also applicable, window frames will be removed for disposal as a PCB Bulk Product Waste.	Porous substrate areas that remain in locations where caulking and associated porous substrates were removed as a Bulk Product Waste, will be verify sampled. One sample per 20 feet of substrate will be sampled to confirm the remaining substrate is less than 1 ppm. Total number of samples anticipated is approximately 20.
Window Glazing[(2)]	Window glazings. Due to the variability of these materials and to avoid additional characterization, all window glazing will be abated as a PCB Bulk Product Waste. Note that the glazing will also be abated as an asbestos waste.	4' x 4' (or smaller) exterior windows (total number 55); 3'x 5' sections of interior windows (total number 3)	0.956 ppm	Classified as Excluded waste; however, will be disposed as a PCB Bulk Product Waste at a state permitted landfill that meets requirements of 761.62(b)	All glazing will be removed from the building prior to demolition and disposed at a state permitted landfill that meets bulk product waste requirements of 761.62(b). This will include the removal of the intact window and frames for disposal as a PCB Bulk Product Waste and asbestos waste	No verification sampling is necessary at the complete window systems will be removed.
PCB Remediation Wastes						
Oil-stained CMU Walls (painted)	Oil-stained CMU materials located on the former boiler room (including the interior separation walls between the former boiler room and the former machine shop, the former "main" room, and the hallway entrance), in the former machine shop (including the interior separation between the former machine shop and the former "main" room), and on the western portion of the former "main" room in the vicinity of the former hydraulic press.	275 tons	50 ppm to 100,000 ppm	To be disposed at TSCA chemical waste landfill per 40 CFR 761.75	Although the oil-staining is generally only on the lower portions of the walls, the entire CMU wall (floor to ceiling) will be segregated during building demolition.	None
Concrete Floor (≥500 ppm)	Concrete floor from the entire former boiler room area (including the "water pit" concrete walls and base)		240 ppm to 78,000 ppm	To be disposed at TSCA chemical waste landfill per 40 CFR 761.75	Segregate during building demolition	None
Concrete Floor (<500 ppm)	Concrete floor in all areas outside of the former boiler room	1,000 tons	0.91 ppm to 92 ppm	To be managed on site under a capping system per CFR 761.61(a)(7)	Segregate during building demolition	None
Non-porous Surfaces (Metal)	Former hydraulic press and the punch press unit; heat exchanger and associated piping.	-	79 to 3,100 ug/100 cm2	PCB Remediation Waste to be decontaminated on site	Prior to or as part of building demolition activities, non-porous surfaces will be decontaminated in accordance with 40 CFR 761.360 through 40 CFR 761.378 of the TSCA regulations.	[(2)] The decontaminated non-porous surfaces will be sampled using wipe samples to confirm that the residual PCB concentrations are less than the high occupancy standard of 10 µg/100 cm2. A total of 5 wipe samples (each) will be collected from the decontaminated hydraulic press and from the punch press unit (5 samples each). For the heat exchanger (and associated piping), access to the interior of the components will be conducted as part of demolition, and wipe samples will be collected. If detections above 10 µg/100 cm2 are detected, a separate submittal to EPA will be prepared requesting approval for decontamination of the equipment or for disposal to a smelter. Thorough decontamination of interior piping components may not be feasible.

TABLE 1 - PCB Cleanup Plan Addendum No. 2 Submittal*

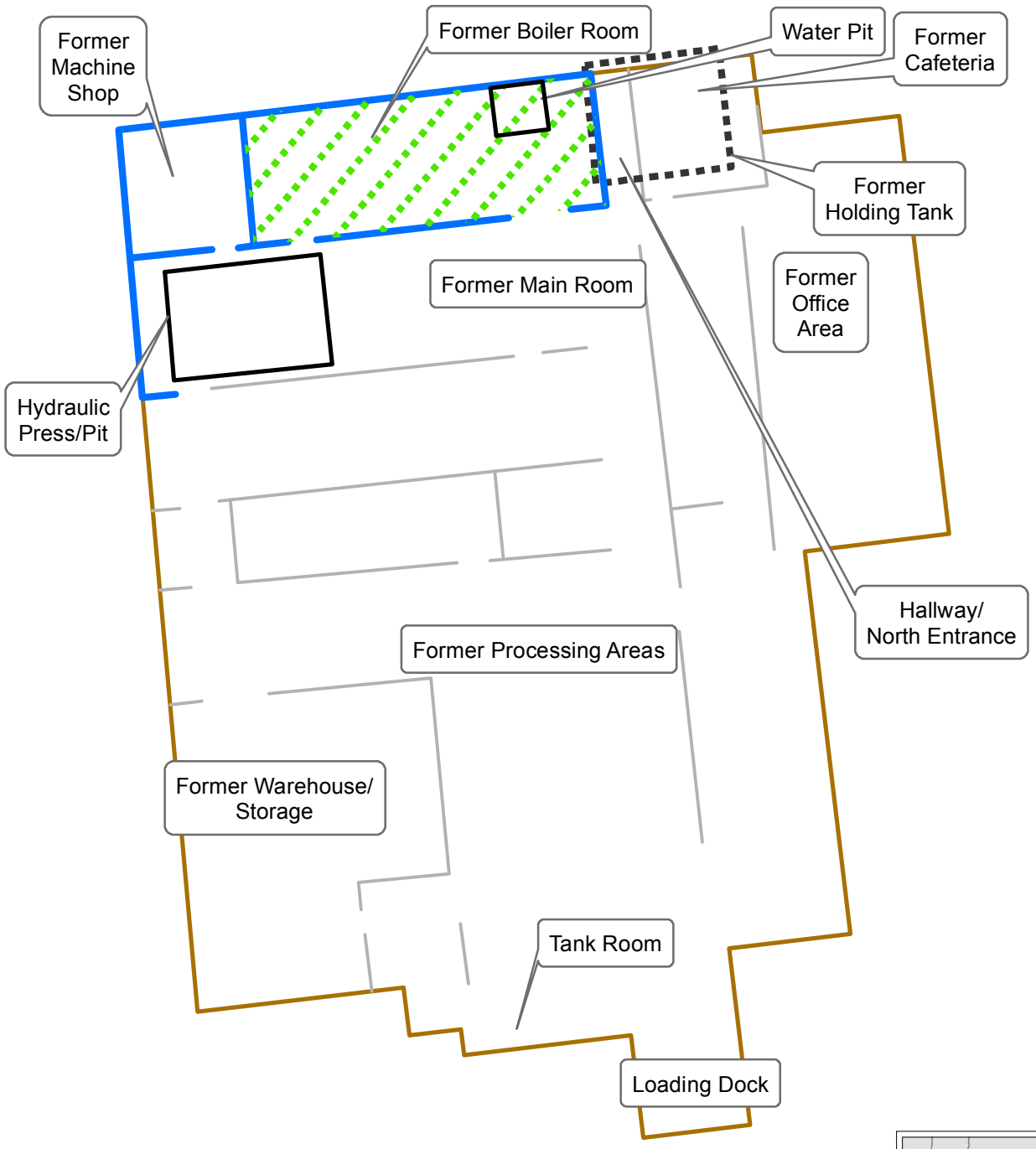
Summary of Proposed Waste Management of PCB-Impacted Materials
Former Polymerine, Inc.
241 Duchaine Boulevard
New Bedford, Massachusetts

Material Type	Description	Quantity (Approximate)	PCB Concentration	TSCA Classification	Proposed Material Management	Verification Sampling
Water in Pits	Water in the water pit in former boiler room, the former hydraulic press pit in the former "main" room, former holding tank located beneath the eastern end of the former boiler room.	30,000 gallons	ND to 0.55 ppb	PCB Remediation Waste	As part demolition activities, the water from the two open pits and from the former holding tank will be pumped out to a frac tank for temporary storage. The water will be treated through activated carbon adsorption, temporarily stored, sampled and then discharged on site.	[(2)] To confirm that PCBs in the treated water are less than 0.5 µg/L (i.e., the MCP Method 1, GW-1 standard) following treatment and prior to discharge, a total of 5 samples will be collected from the treated water.
Soils (≥500 ppm)	Proposed Excavation Areas #1, #2, and #3	470 cubic yards	≥500 ppm	To be disposed at TSCA chemical waste landfill per 40 CFR 761.75	Contaminated soil excavation will occur per the PCB Cleanup Plan.	Samples to be collected at 10-foot intervals along the sidewalls and at the base of the excavations. For sidewall samples, samples to be collected vertically every two feet. Total number of samples anticipated for these three excavation areas is approximately 110.
Soils (≥25 ppm)	Proposed Excavation Areas #4, #5 and #7	430 cubic yards	≥25 ppm and <500 ppm	To be managed on site under a capping system per CFR 761.61(a)(7)	Contaminated soil excavation will occur per the PCB Cleanup Plan.	Samples to be collected at 10-foot intervals along the sidewalls and at the base of the excavations. For sidewall samples, samples to be collected vertically every two feet. Total number of samples anticipated for these three excavation areas is approximately 120.
Soils (≥1 ppm)	Proposed Excavation Area #6	200 cubic yards	≥1 ppm and <25 ppm	To be managed on site under a capping system per CFR 761.61(a)(7)	Contaminated soil excavation will occur per the PCB Cleanup Plan.	Sample to be collected at 25-foot intervals along the sidewalls across the two foot excavation depth interval. Total number of samples anticipated for this excavation areas is approximately 15.
Groundwater (dewatering)	Dewatering will likely be needed for proposed Excavation Areas #1, #2, #3, #5, and #7.	Volume of water to be generated by dewatering efforts during contaminated soil excavation work will be contingent upon Contractor's means/method and schedule to complete excavations.	ND to 0.25 ppb (dissolved concentrations in groundwater)	To be treated and discharged on site.	Groundwater will be pumped from sumps installed within the excavations to a frac tank for temporary storage, then treated through activated carbon before being discharged to the subsurface within or immediately upgradient of the respective excavations.	To confirm that PCBs in the treated groundwater (and water from pits) are less than 0.5 µg/L (i.e., the MCP Method 1, GW-1 standard), a sample will be collected for the first 5,000 gallons of discharge and then one sample collected for every 20,000 gallons generated thereafter.
Excluded PCB Products						
Non-oil stained CMU Walls (painted)	CMU materials in the former processing areas (including the eastern interior wall between the former processing areas and former "main" room), the former warehouse room, and the former tank room	300 tons	ND to <50 ppm, with paint being the source of the PCBs	Excluded PCB Products	Segregate prior to demolition and dispose at a state permitted landfill.	None

*Unless otherwise noted, this summary table is based on the contents of the August 2015 PCB Cleanup Plan and December 2015 PCB Cleanup Plan Addendum No. 1 submittals

[(1)] ACM - asbestos containing materials

[(2)] These items were either not addressed in or have been modified from the August 2015 PCB Cleanup Plan submittal.



All Tighe & Bond Locations Are Considered Approximate

- Building
- Water Pit (See Note 3)
- Interior Walls (not all shown)
- Oil Stained CMU Walls to be disposed as PCB Remediation Waste (See Note 1)
- Concrete Floors w/PCBs >500 ppm to be disposed as PCB Remediation Waste (See Note 2)

Notes:
1. Non-oil stained CMU walls to be managed off-site as Excluded PCB Product
2. Concrete floor w/PCBs <500 ppm to be managed on-site
3. Water from pits and former holding tank to be treated and discharged on site.

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Feet

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Tighe&Bond
Consulting Engineers
Environmental Specialists

ADDENDUM NO. 2 - FIGURE 1
PROPOSED BUILDING MATERIALS MANAGEMENT PLAN

Former Polyply
241 Duchaine Blvd
New Bedford, MA

February 2016

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Photo Reference
PCB Cleanup Plan Addendum No. 2
Attachment

PHOTOGRAPH 1: Former hydraulic press (former Main room)

PHOTOGRAPH 2: Former punch press unit (former Processing area)

PHOTOGRAPH 3: Former heat exchanger (former boiler room)